



Policy Name: Conflict of Interest and Disclosure of Certain Interests

Policy Number: B-5

Functional Area(s) Responsible: College President

Owner(s) of Policy: College President

Most Recent BOT Approval Date: September 2011

Most Recent Review Date: Spring 2023

Most Recent Review/Revision Type: none minor/non-substantive substantive/extensive

Policy Statement:

An actual or potential conflict of interest occurs when a college trustee or employee is in a position to influence a decision that may result in personal gain or gain for a relative as a result of Finger Lakes Community College’s business dealings.

Personal gain may result not only in cases where a college trustee, employee, or relative has significant ownership in a firm with which Finger Lakes Community College does business, but also when a college trustee, an employee, or a relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business deali

or
potential conflicts of interest. FLCC trustees must submit a Conflict of Interest Disclosure Statement (Appendix A) annually. Affiliated board members and management employees must submit a Conflict of Interest Certification (Appendix B) annually.

No presumption of a conflict is created by the mere existence of a relationship with outside entities. However, if a board member or an employee has any influence on any material business transactions, it is imperative that he or she discloses to an officer of the college as soon as possible the existence of any actual or potential conflict of interest. This policy is intended to provide guidance on issues related to acceptable standards of operation.

Date: _____ Signature: _____

APPENDIX B

**FINGER LAKES COMMUNITY
COLLEGE CONFLICT OF INTEREST
CERTIFICATION**

MANAGEMENT CONFIDENTIAL EMPLOYEES

The conflict of interest policy includes a provision, which sets forth standards of conduct expected and requiring board members and management employees to disclose all interests, which could result in a conflict.

Please complete and return the enclosed conflict of interest disclosure statement. Please be assured that the disclosure requirements are intended to provide the College President with a systematic and ongoing method of disclosing and ethically resolving potential conflicts of interest. Although it is impossible to list every circumstance giving rise to a possible conflict of interest, the following will serve as a guide to the types of activities that might cause conflicts and that should be fully reported:

1. Outside Interests

- A. To hold, directly or indirectly, a position or a financial interest in any outside concern from which the individual has reason to believe the College secures goods or services (including tur L1AMID 1 (in)0.x7)-5.co

Full disclosure of any situation in doubt should be made so as to permit an impartial and objective determination. It should be particularly noted that disclosure relates not only to yourself, but also to your immediate family members.

listed below:

I hereby agree to report to the College President any further situation that may develop before completion of my next questionnaire.

Date

Name (Printed or typed)

Signature